

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

-----x  
APRIL BROWN and SHARI BURANONDHA, each  
individually and on behalf of all others similarly situated,

*Plaintiffs,*

v.

FORCE ONE INTERNATIONAL SECURITY, INC. FKA  
FORCE ONE INTERNATIONAL SECURITY &  
CONSULTANT FIRM, INC., AHMED SHAHEED, Sr. AKA  
AHMED SHAHEED, Sr., and AHMAD SHAHEED, Jr. AKA  
AHMED SHAHEED, Jr.,

*Defendants.*

-----x  
**Notice of Motion for  
Default Judgment**

**14 Civ. 2614 (NGG)(LB)**

Plaintiffs April Brown and Shari Buranondha, each individually and on behalf of all others similarly situated respectfully move the Court pursuant to FED. R. CIV. P. 55(b) and L. CIV. R. 55.2 to enter default judgment in favor of Plaintiffs and against Corporate Defendant Force One International Security, Inc., fka Force One International Security & Consultant Firm, Inc., and the Individual Defendants Ahmad Shaheed, Sr. AKA Ahmed Shaheed, Sr., and Ahmad Shaheed, Jr. AKA Ahmed Shaheed, Jr. on the grounds that Defendants failed to answer or otherwise defend against the Complaint.

Dated: New York, New York  
July 30, 2014

By: THE HARMAN FIRM, PC

s/ Walker G. Harman, Jr.  
Walker G. Harman, Jr. [WH-8044]  
1776 Broadway, Suite 2030  
New York, New York 10019  
(212) 425-2600  
wharman@theharmanfirm.com

To: Force One International Security, Inc.  
Ahmad Shaheed, Sr.  
Ahmad Shaheed, Jr.  
1164 Bedford Avenue  
Brooklyn, New York 11216